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6 Attorneys for Defendants
7 TOYOTA MOTOR NORTH AMERICA INC.;
TOYOTA MOTOR ENGINEERING &
8 MANUFACTURING NORTH AMERICA; and
TOYOTA MOTOR SALES, U.S.A., INC.

9 [Additional Counsel for the Parties Listed on Signature
10 Page]

11
12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA
14

15 JOHN WADE,

16 Plaintiff,

17 vs.

18 TOYOTA MOTOR NORTH AMERICA INC.;
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA;
20 and TOYOTA MOTOR SALES, U.S.A., INC.,

21 Defendants.

22 Case No. 2:25-cv-01071-TLN-CKD

23 **JOINT STIPULATION TO EXTEND
DEFENDANTS' DEADLINE TO
RESPOND TO COMPLAINT; ORDER**

24 Chief Judge: Hon. Troy L. Nunley

25 Complaint Filed: April 10, 2025

1 Pursuant to E.D. Cal. L.R. 143 and 144, Plaintiff John Wade and Defendants Toyota
2 Motor North America Inc., Toyota Motor Engineering & Manufacturing North America and
3 Toyota Motor Sales, U.S.A., Inc. (“Defendants”) (collectively, the “Parties”), by and through
4 their undersigned counsel, stipulate and agree as follows:

5 **WHEREAS**, on April 10, 2025, Plaintiff’s counsel in this case filed a complaint
6 (“Complaint”) against Defendants in the United States District Court for the Eastern District of
7 California, captioned *John Wade, et al., v. Toyota Motor North America Inc., et. al.*, No. 2:25-
8 cv-01071-TLN-CKD (the “Action”);

9 **WHEREAS**, on April 14, 2025, Plaintiff served the Summons and Complaint on each of
10 the Defendants;

11 **WHEREAS**, as of April 28, 2025, Defendants retained counsel to represent them in this
12 Action;

13 **WHEREAS**, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the deadline for
14 Defendants to respond to the Complaint currently is May 5, 2025;

15 **WHEREAS**, counsel for the Parties have met and conferred regarding Defendants’
16 deadline to respond to the Complaint and agreed to seek the Court’s approval that Defendants
17 may have up to and including July 3, 2025, to respond to the Complaint to allow Defendants
18 sufficient time to evaluate and respond to the ten counts; and

19 **WHEREAS**, no previous extensions of Defendants’ time to respond to the Complaint
20 have been requested in the Action.

21 **IT IS HEREBY STIPULATED** by and between the Parties that Defendants’ responses
22 to the Complaint shall be filed on or before July 3, 2025.

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1 Dated: April 30, 2025

MORGAN, LEWIS & BOCKIUS LLP
David L. Schrader
Lisa R. Weddle

4 By /s/ Lisa R. Weddle
5 Lisa R. Weddle

6 Attorneys for Defendants
7 TOYOTA MOTOR NORTH AMERICA
8 INC.; TOYOTA MOTOR
9 ENGINEERING &
MANUFACTURING NORTH
AMERICA; and TOYOTA MOTOR
SALES, U.S.A., INC.

10 Dated: April 30, 2025

KELLER ROHRBACK L.L.P.
Ryan McDevitt (*pro hac vice*)
Matthew Melamed (Bar No. 260272)

12 SHUB JOHNS & HOLBROOK LLP
13 Jonathan Shub (Bar No. 237708)
14 Benjamin E. Johns (*pro hac vice*)
Samantha E. Holbrook (*pro hac vice*)

15 WITTELS MCINTURFF PALIKOVIC
16 Ethan D. Roman (*pro hac vice*)

17 By /s/ Ryan McDevitt
18 Ryan McDevitt

19 Attorneys for Plaintiff
JOHN WADE

22 In accordance with the foregoing stipulation **IT IS SO ORDERED.**

24 Dated: April 30, 2025



25 _____
26 Troy L. Nunley
27 Chief United States District Judge
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